

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME
TO RESPOND TO MOTION OF UNITED PARCEL SERVICE TO COMPEL
PRODUCTION OF DOCUMENTS REQUESTED IN INTERROGATORIES
UPS/USPS-2(a) AND 2(b)
(December 4, 2001)

The United States Postal Service hereby moves for an extension of time to respond to Motion of United Parcel Service to Compel Production of Documents Requested in Interrogatories UPS/USPS-2(a) and 2(b) ("UPS Motion"). The UPS Motion was filed on November 27, 2001, making a response due today. The Postal Service requests that it be granted an extension of no more than three days – until Friday, December 7, 2001 – to file its response.

The extension is requested because the Postal Service is continuing to review and discuss this matter. The extension is warranted, given the sensitivity of issues concerning OIG audit reports, and the different groups that need to be consulted.

It is entirely possible that the Postal Service will not need the three full days to respond. If that is the case, then the Postal Service will file its response prior to Friday. Undersigned counsel contacted counsel for UPS and notified him that this motion for extension of time would be filed today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Susan M. Duchek

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December 4, 2001